

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Savinder SINGH

Case: 2:21-mj-30514

Assigned To : Unassigned

Assign. Date : 11/2/2021

Case No.

Description: RE: SAVINDER SINGH
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2, 2021 in the county of Eastern in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841 (a)(1) and (b)(1)(A)

Possessed with intent to distribute cocaine

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: November 2, 2021City and state: Detroit, Michigan*Complainant's signature*Daniel Ghareeb, Special Agent, HSI*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Daniel Ghareeb, being sworn, depose and state the following:

INTRODUCTION

1. This affidavit is in support of a criminal complaint charging Savinder SINGH with possession with intent to distribute cocaine, a schedule II controlled substance in violation of Title 21, United States Code, Sections. 841(a)(1) and (b)(1)(A).

2. I am currently a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) in Detroit, Michigan. I have been a Special Agent with HSI since 2007. Prior to my current assignment, I was a police officer with the North Baltimore Ohio Police Department for approximately two years. I hold a Bachelor and Masters of Science in Criminal Justice. I have received specialized training about illegal drug trafficking and money laundering at the Federal Law Enforcement Training Center located in Brunswick, Georgia. I have led and participated in numerous investigations related to illegal drug trafficking as well as methods used to finance drug transactions and launder drug proceeds.

3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not

contain all information known to law enforcement pertaining to this investigation.

4. As set forth in more detail below, this investigation has shown that on or about November 2, 2021, Savinder SINGH attempted to exit the United States to Canada via the Detroit Ambassador Bridge, located in the Eastern District of Michigan. There is probable cause to conclude SINGH possessed with an intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

PROBABLE CAUSE

5. On November 2, 2021, the Detroit Contraband Enforcement Team (DCET) was conducting outbound enforcement operations at the Detroit Ambassador Bridge. At approximately 12:00 AM, DCET Customs and Border Protection Officers (CBPO) attempted to make contact with the driver of a commercial tractor (Ontario PA41668) and trailer (Ontario T8504X). The driver of the tractor trailer was later identified as Savinder SINGH. CBPO Martin was flagging down SINGH's semi-truck and directing it over to the location where the outbound inspections were being conducted. The driver continued travelling in the outbound lanes in the direction of Canada. CBPO Martin began running on foot and flashing his flashlight trying to get the truck to stop. CBPO Gerhardt got in a marked CBP vehicle and was

required to engage the overhead blue and red emergency lights before the tractor trailer finally stopped prior to the toll booths, on-ramp, and bridge to Canada. CBPO Martin told the driver, later identified as Savinder SINGH to follow the CBP vehicle over to the inspection area. CBPO Gerhardt noticed SINGH was not following and on his phone. CBPO Gerhardt asked SINGH for his cell phone and took it. CBPO Gerhardt instructed SINGH to follow her so that the truck could be inspected. Once SINGH was parked in the inspection area, CBPO Gerhardt obtained a negative declaration from SINGH for any guns, ammunition, military equipment, or currency over \$10,000.

6. CBP Officers performed a search of the trailer and found five brown boxes on the floor in between the cargo of paper rolls. CBPO Martin opened a box which contained vacuum sealed bags containing a white substance. CBP Officers placed SINGH in handcuffs.

7. The individually wrapped bundles were weighed with a total weight of 142.45 kilograms. Narcotics Gemini testing was conducted on several of the individually wrapped bundles. The bundles weighed approximately one (1) kilogram each and all of the tested parcels returned positive for cocaine.

8. At Approximately 3:45 AM, HSI Special Agents interviewed SINGH. SINGH was advised of his Miranda statement of rights and waived

his rights. SINGH stated that he entered the U.S. between 6:00 and 7:00 AM on November 1, 2021. After entering the U.S. SINGH stated he drove to Howell, Michigan, to drop off his cargo containing doors and windows. SINGH stated he then drove to Battle Creek, Michigan, to pick up large paper rolls. SINGH stated he was to take the paper rolls back to Brampton, Ontario. SINGH stated that he drove from Battle Creek to Perrysburg, Ohio, in order to rest at Love's Travel Stop. SINGH stated that he likes to eat at Love's Travel Stops and he particularly liked the Perrysburg location. SINGH was asked why he didn't stop at one of the three Love's located on his route from Battle Creek to Brampton, he stated he didn't see any Love's off the highway. When confronted with Perrysburg, Ohio, being almost three (3) hours round trip out of his way, SINGH insisted that he likes that specific Love's and stops and gets a sandwich from the Arby's located inside. SINGH stated that he did not know how the cocaine got into the trailer of his cargo.

9. Review of the Bill of Lading revealed that cargo seal #3030623 was secured on the trailer after the cargo was loaded in Battle Creek, Michigan. SINGH also sent a picture of cargo seal #3030623 secured to his trailer to his company dispatch, TransKing Transportation. When SINGH arrived for inspection at the Detroit Ambassador Bridge, the number on the seal that was on the trailer did not match the number listed on the Bill of

Lading. Seal #28419 was the seal that CBP cut when they began inspection at the Ambassador Bridge. In my experience, when truck drivers add drugs to their cargo to smuggle into Canada, they cut their legitimate cargo seal and replace it with another. The seal is replaced to disguise the fact that contraband has been placed with legitimate cargo, as law enforcement is trained to look for cargo seals to authenticate and corroborate import and export declarations.

10. Based on my training and experience, the volume of controlled substances and the manner in which they were being transported from the United States to Canada is indicative of a broader drug trafficking effort that is involved in the further distribution of the controlled substances.

CONCLUSION

12. Based on my experience, drug trafficking organizations transport several million dollars of cocaine in a coordinated manner. Every individual involved in the transportation of cocaine are known to the organization and reimbursed monetarily by the organization. Based on the above, probable cause exists to show that Savinder SINGH possessed with the intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).



Daniel Ghareeb
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

November 2, 2021